

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

DEBORAH YOUNG, as Special Administrator	)	
of the Estate of GWENDOLYN YOUNG,	)	
deceased,	)	
	)	
Plaintiff,	)	
	)	Case No. 13-CV-315-JED-JFJ
v.	)	
	)	
VIC REGALADO, SHERIFF OF TULSA	)	
COUNTY, in His Official	)	
Capacities, <i>et al.</i> ,	)	
	)	
Defendant.	)	

**JOINT MOTION TO ENTER JUDGEMENT**

Plaintiff and Defendant Regalado, through their undersigned counsel, inform the Court that this matter has been settled by way of an Agreed Judgment on all claims of the Plaintiff *Deborah Young, as Special Administrator of the Estate of Gwendolyn Young, deceased, against Vic Regalado, Sheriff of Tulsa County, in his official capacity*, only,<sup>1</sup> in the above captioned case.<sup>2</sup>

*In lieu* of any and all claims for money damages, pre or post judgment interest, attorney fees and costs in whatever form or however denominated which arise from or may have arisen from the instant litigation, Plaintiff and Defendant, Vic Regalado<sup>3</sup>, in his official capacity as the Tulsa County Sheriff, have agreed to enter the Agreed Judgment submitted herewith in the amount of Three Million Six Hundred Thousand Dollars (\$3,600,000.00), and post-judgment interest

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<sup>1</sup> *Revilla v. Regalado*, NDOK Case No. 13-cv-315-JED-JFJ is comprised of four separate claims made by four separate and distinct Plaintiffs. This Agreed Judgment concerns only the claims of Deborah Young, as Special Administrator of the Estate of Gwendolyn Young, deceased over the medical care and treatment of Gwendolyn Young.

<sup>2</sup> To be clear, Plaintiff has not settled any of her claims against Defendant Correctional Healthcare Companies, Inc. (“CHC”).

<sup>3</sup> On October 13, 2020, Plaintiff Young dismissed all claims against Stanley Glanz, in his individual capacity with prejudice, *see* Doc. No. 578.

thereon calculated in accordance with 28 U.S.C. § 1961 in full settlement of this matter including attorney fees and costs.

This compromise, settlement, and resulting Judgment are intended to fully resolve all claims between Plaintiff Deborah Young and Defendant Vic Regalado, in his official capacity over the claims for the medical care and treatment of Gwendolyn Young and alleged civil rights violations. Defendant Regalado, Sheriff of Tulsa County, in his official capacity, is in no way admitting liability or fault by him or by any named or unnamed employees and/or agents of Tulsa County or the Tulsa County Sheriff's Office.

To effectuate their agreement and settlement, Plaintiff and Defendant respectfully request this Court to execute the Agreed Judgment submitted herewith in favor of Plaintiff, *Deborah Young, as Special Administrator of the Estate of Gwendolyn Young, deceased, against Vic Regalado, Sheriff of Tulsa County, in his official capacity*, Case No. 13-CV-315-JED-JFJ in the amount of Three Million Six Hundred Thousand Dollars (\$3,600,000.00), and post-judgment interest thereon calculated in accordance with 28 U.S.C. § 1961 in full settlement of this matter.

Wherefore, the parties jointly request that the Court enter the Agreed Judgment Against Vic Regalado in His Official Capacity as Sheriff of Tulsa County, submitted herewith.

Respectfully Submitted,

/s/ Guy A. Fortney  
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**CERTIFICATE OF SERVICE**

This is to certify that on the April 12, 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants entered in this case.

/s/ Guy A. Fortney  
Guy A. Fortney